

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE GENWORTH FINANCIAL,
INC. SECURITIES LITIGATION**

Case No. 14-CV-02392 (AKH)

DEFENDANTS' MOTION FOR LEAVE TO FILE MATERIAL UNDER SEAL

Defendants Genworth Financial, Inc. ("Genworth") Michael D. Fraizer and Martin P. Klein (collectively, "Defendants") respectfully move the Court pursuant to Rule 4.B. of the Court's Individual Rules, and pursuant to §7(e)(3) of the Court's November 4, 2015 Stipulated Protective Order (the "Protective Order"), for leave to file portions of the September 21, 2016 deposition transcript of Michael Fraizer ("Fraizer"), and the September 28, 2016 deposition transcript of Martin Klein ("Klein"), which excerpts are attached as Exhibits 3 and 4 to the Parties' November 7, 2016 joint letter submitted pursuant to Rule 2.E. of the Court's Individual Rules. The portions of the Fraizer and Klein transcripts that Defendants have designated as "Confidential" pursuant to section 1(a) and 5(c) of the Protective Order contain confidential and proprietary business and financial information of Defendant Genworth Financial Inc.'s.

Pursuant to §7(e)(3) of the Protective Order, Plaintiffs now have ten (10) days either to agree that the Protected Material does not need to be sealed or to submit a motion to Chambers specifying the portions to be sealed and setting forth the reasons why sealing is appropriate under the circumstances.

Dated: November 7, 2016
New York, New York

DENTONS US LLP

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